

### **REMARKS**

Claims 1-18 are pending in the present application. The Office Action and cited references have been considered. Favorable reconsideration is respectfully requested.

Claims 1-9 and 12-18 are rejected under 35 U.S.C. §102(b) as being anticipated by Estakhri et al. (U.S. Patent No. 5,930,815). Claims 10-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Estakhri in view of Asnaashari (U.S. Patent No. 5,928,370). These rejections are respectfully traversed for the following reasons.

Claim 1 recites a method for writing memory sectors in individually-deletable memory blocks (SB), comprising a number of memory sectors, whereby access to the physical sectors is achieved by means of an allocation table (ZT) for address conversion of a logical address (LA) into a physical block address (RBA) and a physical sector address (RSA), and whereby when a sector write command is to be carried out, which relates to an already written sector, the writing takes place to an alternative memory block (AB) by means of an altered address conversion, wherein the writing processes for sectors are carried out one by one to adjacent sectors of the alternative memory block (AB) and the position of the relevant sector in the alternative block (AB) is stored in a sector table. This is not taught, disclosed or made obvious by the prior art of record.

Applicant respectfully submits that Estakhri does not teach the method of the present application. The present application is related to flash memory devices, which are

organized in blocks and these blocks are organized into sectors, where the sectors are writable individually into erased memory cells. The blocks are individually erasable, but not the sectors. If a sector has to be written a second time, this has to be done in another block.

Amended claim1 specifies that the writing processes for sectors are carried out one by one to adjacent sectors of the alternate memory block and the position of the relevant sector in the alternate memory block is stored in a sector table. This means that multiple modifications of the same sector are written into the one alternate memory block and the sector table indicates where the valid sector is stored in the alternate memory block. By this amendment, Applicant has included in the claim the feature asserted by the Examiner on page 10 of the Office Action to be absent in the previously pending claim, *i.e.*, selection of the next physical block.

In contrast, Estakhri teaches only that, if a previous written sector has to be written again, a new alternate block has to be used. This is described in the figures 12 to 15 and the corresponding specification column 14, line 45 to column 16, line 10. Estakhri uses a sector table (714), but it shows only that a sector was rewritten. For every rewriting of the same sector, a new block of sectors and a new line in the table (700) is necessary. This method is not as efficient as the method in the present application. Additionally, in Estakhri, a second table (510) is necessary, which has an entry for every sector of the whole memory system, and therefore is very large.

In the present application, only small tables are necessary: the address allocation table ZT and the sector table IT or ST. This configuration makes the memory

system very fast, as there are short searches and fewer block erases. These features, in the claimed combination as set forth in claim 1, are not taught or suggested in Estakhri. For at least these reasons, Applicant respectfully submits that claim 1 is patentable over the prior art of record.

Claims 2 -17 depend from an included recitation of claim 1. Applicant respectfully submits these claims are patentable of and of themselves, and at least for the reasons discussed above with respect to claim 1. Claim 18 is believed to be patentable at least for the reasons discussed above with respect to claim 1.

In view of the above amendments and remarks, Applicant respectfully requests entry of the proposed amendment and reconsideration and withdrawal of the outstanding rejections of record. Applicant submits that upon entry of the proposed amendment, the application will be in condition for allowance and early notice to this effect is most earnestly solicited.

If the Examiner has any questions, he is invited to contact the undersigned at 202-628-5197.

Respectfully submitted,

BROWDY AND NEIMARK, P.L.L.C.  
Attorneys for Applicant(s)

By /Ronni S. Jillions/  
Ronni S. Jillions  
Registration No. 31,979

RSJ:me  
Telephone No.: (202) 628-5197  
Facsimile No.: (202) 737-3528  
G:\BN\B\Back\Kuhne3\Pto\2008-05-02AmendmentKUHNE3.doc